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Arizona Corporation Commission

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AZ CORP COMMISSION
DOCUMENT CONTROL

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IN THE MATTER OF QWEST)
CORPORATION'S COMPLIANCE WITH)
SECTION 252(e) OF THE)
TELECOMMUNICATIONS ACT OF 1996)

Docket No. RT-0000F-02-0271

**AT&T COMMUNICATIONS OF THE MOUNTAIN STATES AND TCG
PHOENIX'S FIRST SET OF DATA REQUESTS TO QWEST**

AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively "AT&T") hereby propound the following data requests to Qwest Corporation ("Qwest"), to be answered by those officers, employees or agents of Qwest (or its subsidiaries, affiliates or parent companies) as may be cognizant of the requested information and who are authorized to answer on behalf of Qwest. Please provide full and complete responses to AT&T within 7 days of your receipt of these data requests.

DEFINITIONS

As used herein, the following terms have the meaning as set forth below:

1. The terms "Qwest," "you," and "your" shall include Qwest Communications International, Inc., Qwest Corporation, Qwest Communications Corporation, Qwest Services Corporation, and their parents, subsidiaries, and affiliates, their former and present officers, attorneys, employees, servants, agents and representatives, and any person acting on their behalf for any purpose.
2. "List", "describe", "explain", "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which Qwest or its agents or

representatives have knowledge which is relevant to the answer called for by the interrogatory.

3. The terms "document" or "documents" as used herein shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals and copies (regardless of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including, but not limited to: correspondence, letters, memoranda, notes, reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, workpapers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:
 - (a) are now or were formerly in your possession, custody or control; or
 - (b) are known or believed to be responsive to these interrogatories, regardless of who has or formerly had custody, possession or control.
4. The terms "identify" and "identity" when used with reference to a natural person mean to state his or her full name, present or last known address, present or last known telephone number, present or last known place of employment, position or business affiliation, his or her position or business affiliation at the time in question, and a general description of the business in which he or she is engaged.
5. The terms "identify" and "identity" when used with respect to any other entity mean to state its full name, the address of its principal place of business and the name of its chief executive officers.
6. The terms "identify" and "identity" with respect to a document mean to state the name or title of the document, the type of document (e.g., letter, memorandum, telegram, computer input or output, chart, etc.), its date, the person(s) who authored it, the person(s) who signed it, the person(s) to whom it was addressed, the person(s) to whom it was sent, its general subject matter, its present location, and its present custodian. If any such document was but is no longer in the possession of Qwest or subject to its control, state what disposition was made of it and explain the circumstances surrounding, and the authorization for, such disposition, and state the date or approximate date of such disposition.

7. The terms “identify” and “identity” with respect to any non-written communication mean to state the identity of the natural person(s) making and receiving the communication, their respective principals or employers at the time of the communication, the date, manner and place of the communication, and the topic or subject matter of the communication.
8. The term to “state the basis” for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all pertinent legal theories upon which you rely for your knowledge, information and/or belief that there are good grounds to support such allegation, contention, conclusion, position or answer.
9. The terms “relates to” or “relating to” mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.
10. The term “including” means “including, but not limited to.”
11. The term “CLEC” means any competing local exchange carrier not affiliated with Qwest, regardless of whether the carrier is presently providing local telephone exchange services in the State of Arizona.

INSTRUCTIONS

- A. These data requests shall be deemed to be continuing. Qwest is obliged to change, supplement, and correct all answers to interrogatories and responses to the production request to conform to available information, including such information as first becomes available to Qwest after the answers and production of documents hereto are filed and made, should additional information become known or should information supplied in the answers or documents prove to be incorrect or incomplete.
- B. The Response to each data request provided should first restate the question asked and also identify the person(s) supplying the information.
- C. In answering these data requests, furnish all information that is available to you or may be reasonably ascertained by you, including information in the possession of any of your agents or attorneys, or otherwise subject to your knowledge, possession, custody or control.
- D. If in answering these data requests you encounter any ambiguity in construing the request or a definition or instruction relevant to the inquiry

contained within the interrogatory or request, set forth the matter deemed “ambiguous” and set forth the construction chosen or used in answering the interrogatory or responding to the request.

E. If you object to any part of a request, answer all parts of such requests to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

F. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to a request, contained in a document, set forth with respect to the document:

- (i) the date and number of pages of the document;
- (ii) the identity of the author(s) and/or preparer(s);
- (iii) the identity of the addressee, if any;
- (iv) the title;
- (v) the type of tangible thing (e.g., letter, memorandum, telegram, chart, report, recording disc);
- (vi) the subject matter (without revealing the information as to which privilege or protection from non-disclosure is claimed);
- (vii) the identity of each person who has received the document or to whom knowledge of the contents of the document was communicated;
- (viii) the identity of the present custodian(s);
- (ix) the nature of your claim of non-discoverability (e.g., attorney-client privilege); and
- (x) each and every fact on which you rest your claim of privilege or other protection from disclosure, stated with sufficient specificity to permit the Joint Intervenors to make a full determination as to whether your claim is valid.

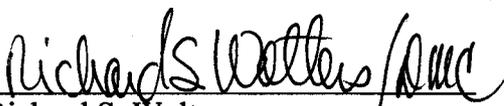
DATA REQUESTS

1. Provide a non-redacted copy of the Supplemental Testimony of W. Clay Deanhardt, along with copies of all exhibits and documents, filed in Minnesota Docket Nos. P-421/C-02-197 and P-421/CI01-1371.

2. Provide a non-redacted copy of the Affidavit of Ms. Lori Deutmeyer dated June 11, 2002, along with copies of all exhibits and documents, identified in the Supplemental Testimony of W. Clay Deanhardt.
3. Provide a non-redacted copy of the Affidavit of Mr. Blake O. Fisher dated June 12, 2002, along with copies of all exhibits and documents, identified in the Supplemental Testimony of W. Clay Deanhardt.
4. Provide a non-redacted copy of the deposition of Ms. Lori Duetmeyer, along with copies of all exhibits and documents, taken in Minnesota Docket Nos. P-421/C-02-197 and P-421/CI01-1371.
5. Provide a non-redacted copy of the deposition of Mr. Blake O. Fisher, along with copies of all exhibits and documents, taken in Minnesota Docket Nos. P-421/C-02-197 and P-421/CI01-1371.
6. Provide a non-redacted copy of the deposition of Audrey McKenney, along with copies of all exhibits and documents, taken in Minnesota Docket Nos. P-421/C-02-197 and P-421/CI01-1371.

Dated this 26th day of July, 2002.

AT&T Communications of the
Mountain States, Inc.
and TCG Phoenix


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CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of **AT&T Communications of the Mountain State and TCG Phoenix's First Set of Data Requests to Qwest**, Docket No. RT-00000F-02-0271, were sent by overnight delivery on July 26, 2002 to:

Arizona Corporation Commission
Docket Control – Utilities Division
1200 West Washington Street
Phoenix, AZ 85007

and that a copy of the foregoing was sent by Overnight Delivery on July 26, 2002 to:

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and a true and correct copy was sent by U.S. Mail, postage prepaid, on July 26, 2002 to:

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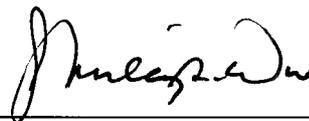
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Executed on July 26, 2002 in San Francisco, California.



Shirley S. Woo